

RIC 2001
50.59/Maintenance Rule
Implementation and Status
Session W15

50.59/Maintenance Rule
Interface - A Utility's Perspective

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Temporary Alterations Supporting Maintenance/Maintenance Procedure Changes

Implementation Action:

Substitute 50.65(A)(4) for 50.59

Issues:

- 1) Typically Tech Specs, Tech Spec Bases, TRM & UFSAR Reviews are part of 50.59 process. How will these documents now be maintained?
- 2) How/when will 50.65(a)(4) be applied?
- 3) What level of Engineering/Technical Involvement will be needed now?

Temporary Alterations Supporting Maintenance/Maintenance Procedure Changes (Cont'd)

Considerations:

Issue 1) Integrate T/S, TSB, TRM & UFSAR Reviews into Temp. (Facility/Procedure) Change Processes.

Issue 2) Two-Fold Approach:

- Perform Risk Assessment during T/A preparation
- Perform (a)(4) assessments of T/A along with other activities prior to performing maintenance.

Issue 3) Current level of Engineering/Technical involvement maintained. Risk assessments take the place of 50.59 review.

Refueling Activities

50.59 vs. Maintenance Rule

Implementation Action:

Determine which refueling activities are “maintenance activities” and which are “procedures as described in the UFSAR”.

From NEI 96-07, Rev. 1:

- Maintenance Activities
 - Activities that restore SSCs to their as-designed condition.
- Procedures as Described in the UFSAR
 - Contains information (described in the UFSAR) such as how SSCs are operated and controlled (including operator actions and response times).

Refueling Activities

50.59 vs. Maintenance Rule (Cont'd)

Maintenance Activities:

- Procedures that control activities establishing the condition enabling fuel handling activities to commence (i.e., heavy lift of RV head). These activities, when completed, restore SSCs to their as-designed condition. [50.65\(a\)\(4\) applies to these activities.](#)

Refueling Activities 50.59 vs. Maintenance Rule (Cont'd)

Procedures as Described in the UFSAR:

- Procedures that control Fuel Handling activities control and operate fuel handling SSCs. 50.59 applies to changes to these procedures.